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Attorneys for Defendants
Cox Communications, Inc.; CoxCom, LLC; and
Cox Communications California, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC.;
COXCOM, LLC; and COX
COMMUNICATIONS CALIFORNIA,
LLC,

Defendants.

Case No. 2:23-cv-01049-JWH-KES

**COX COMMUNICATIONS, INC.,
COXCOM, LLC, AND COX
COMMUNICATIONS
CALIFORNIA, LLC'S
APPLICATION FOR LEAVE TO
FILE UNDER SEAL**

1 COX COMMUNICATIONS, INC.,
2 COXCOM, LLC, AND COX
3 COMMUNICATIONS CALIFORNIA,
4 LLC,

Counter-Claimants,

5 v.

6 ENTROPIC COMMUNICATIONS,
7 LLC; MAXLINEAR
8 COMMUNICATIONS LLC; AND
9 MAXLINEAR, INC.

Counter-Defendants.

1 Pursuant to Local Rule 79-5, Defendants Cox Communications, Inc., CoxCom,
2 LLC, and Cox Communications California, LLC (collectively “Cox”) hereby apply
3 for leave of the Court to file under seal portions of ¶¶ 287, 291-293, 296-298, 302-
4 303, 308, 310-313, 317, 328, 336-337 and 339 of the corrected redline/compare for
5 Cox’s Answer and Defenses to Complaint and First Amended Counterclaims (“First
6 Amended Counterclaims”) that reference confidential information contained in a
7 license agreement for Data Over Cable Service Interface Specifications (“DOCSIS”)
8 executed by MaxLinear Inc, as well as confidential information contained in a Patent
9 Purchase Agreement between Plaintiff Entropic Communications LLC and each of
10 Counter-Defendants MaxLinear Communications LLC and MaxLinear, Inc. It has
11 come to Cox’s attention that there were inadvertent discrepancies with the
12 redline/compare previously submitted as part of Cox’s First Amended Counterclaims
13 that will be addressed with this submission.

14 Redacted and unredacted versions of Cox’s Answer and Defenses to Complaint
15 and First Amended Counterclaims are filed herewith, as is the Declaration of April E.
16 Isaacson in Support of this Application and a Proposed Order, as required by L.R. 9-
17 5.2.2(a). The Court has previously ordered that Cox’s First Amended Counterclaims
18 can be filed under seal. *See* Dkt. 192.

19 Cox respectfully requests that the Court grant the application to file portions of
20 ¶¶ 287, 291-293, 296-298, 302-303, 308, 310-313, 317, 328, 336-337 and 339 of the
21 corrected redline/compare of Cox’s First Amended Counterclaims under seal.
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1 Dated: January 25, 2024

KILPATRICK TOWNSEND & STOCKTON LLP

2 By: /s/ April E. Isaacson

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